1 2 3 4 5	RENE L. VALLADARES Federal Public Defender State Bar No. 11479 RAQUEL LAZO Assistant Federal Public Defender Nevada State Bar No. 8540 411 E. Bonneville, Ste. 250 Las Vegas, Nevada 89101 (702) 388-6577/Phone (702) 388-6261/Fax	
6	(702) 300 02017 41	
7	Attorney for Sherice Williams	
8	UNITED STATES DISTRICT COURT	
9	DISTRICT OF NEVADA	
10	LINUTED STATES OF AMEDICA	Case No. 2:15-CR-294-JAD-VCF
11	UNITED STATES OF AMERICA, Plaintiff,	
12	,	UNOPPOSED MOTION TO MODIFY CONDITIONS OF
13	V.	PRETRIAL RELEASE
14	SHERICE WILLIAMS,	
15	Defendant.	
16		
17	Comes now the defendant, Sherice Williams, by and through her counsel of record,	
18	Raquel Lazo, Assistant Federal Public Defender, and hereby moves this court for an order to	
19	modify her conditions of pretrial release. This motion is supported by the following	
20	Memorandum of Points and Authorities.	
21	DATED this 4 th day of May, 2016.	
22		RENE L. VALLADARES
23		Federal Public Defender
24	By: <u>/s/Raquel Lazo</u>	
25		RAQUEL LAZO Assistant Federal Public Defender
26		Attorney for Sherice Williams

MEMORANDUM OF POINTS AND AUTHORITIES

- 1. On October 28, 2015, Mrs. Williams was released on bond under Pretrial Services supervision with conditions. PR Bond (CR#13). Among those conditions, Mrs. Williams was ordered to surrender any passport to U.S. Pretrial Services. *Id.* Mrs. Williams does not have a passport. Accordingly, the parties request that this condition be removed. The parties further request that this court add as a condition of pretrial services supervision that Ms. Williams not obtain a passport or passport card.
- 2. Neither Pretrial Services Officer Cottman nor the government have any opposition to this modification request.

DATED this 4th day of May, 2016.

RENE L. VALLADARES Federal Public Defender

/s/ Raquel Lazo

By: ______RAQUEL LAZO

Assistant Federal Public Defender

UNITED STATES DISTRICT COURT DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Case No. 2:15-CR-294-JAD-VCF

Plaintiff,

SHERICE WILLIAMS,

Defendant.

PROPOSED ORDER

IT IS HEREBY ORDERED that Defendant Sherice Williams need not surrender her passport as she does not have one.

IT IS HEREBY FURTHER ORDERED that Ms. Williams shall not obtain a passport or passport card.

DATED this 9th day of May, 2016.

UNITED STATES MAGISTRATE JUDGI

CERTIFICATE OF ELECTRONIC SERVICE

The undersigned hereby certifies that he is an employee of the Federal Public Defender for the District of Nevada and is a person of such age and discretion as to be competent to serve papers.

That on May 4, 2016, he served an electronic copy of the above and foregoing **UNOPPOSED MOTION TO MODIFY CONDITIONS OF PRETRIAL RELEASE** by electronic service (ECF) to the person named below:

DANIEL G. BOGDEN United States Attorney CRANE M. POMERANTZ Assistant United States Attorney 333 Las Vegas Blvd. So. 5th Floor Las Vegas, NV 89101

/s/ Brandon Thomas

Employee of the Federal Public Defender